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Attorneys for Defendant
7 NATASHA RENEE CHALK

8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,

14 vs.

15 NATASHA RENEE CHALK,
16 Defendant.

Case No. 1:21-cr-00024-JLT-SKO

**STIPULATION TO MODIFY CONDITIONS
OF PRETRIAL RELEASE; ORDER**

17
18 IT IS HEREBY STIPULATED, by and between the parties, through their respective
19 counsel, Assistant United States Attorney JOSEPH BARTON, counsel for plaintiff, and
20 Assistant Federal Defender CHRISTINA M. CORCORAN, on behalf of MEGHAN D.
21 MCLOUGHLIN, counsel for defendant Natasha Renee Chalk, that Ms. Chalk's conditions of
22 release be modified to permit her to open another cell phone line dedicated to her new business.

23 On February 3, 2021, Ms. Chalk was granted pretrial release on conditions, including the
24 requirement that she is limited to one smartphone, one iPad, and one computer. *See* ECF Dkt. #
25 12, at 2 (condition 7(l)). According to Ms. Chalk's supervising Pretrial Services Officer, Jessica
26 McConville, Ms. Chalk has demonstrated full compliance with the conditions of her release. She
27 has also successfully completed school to be an esthetician and will be opening her own
28 business, Gliss LLC, from her home, dedicated to this work.

1 Ms. McConville supports the proposed modification based on Ms. Chalk's consistently
2 positive performance on supervision, her successful completion of school, and based on Ms.
3 McConville's confirmation of Ms. Chalk's efforts to start her own business. Specifically, Ms.
4 McConville visited the new workspace that Ms. Chalk's has created to devote to her new
5 business. Ms. Chalk will also be providing Ms. McConville with proof of income from the new
6 business once its established. The government has no objection to the modification.

7 In light of the above, the parties request that condition 7(l) of Ms. Chalk's conditions be
8 modified to permit her to possess another cellular phone, for business purposes. All other
9 previously imposed terms and conditions will remain in full force and effect.

10 Respectfully submitted,

11 HEATHER E. WILLIAMS
12 Federal Defender

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14 Dated: July 27, 2022

/s/ Christina M. Corcoran
CHRISTINA M. CORCORAN
MEGHAN D. MCLOUGHLIN
Assistant Federal Defenders
Attorneys for Defendant
Natasha Renee Chalk

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19 PHILLIP A. TALBERT
United States Attorney

20 Date: July 27, 2022

/s/ Joseph Barton
JOSEPH BARTON
Assistant United States Attorney
Attorney for Plaintiff

ORDER

Pursuant to the parties' stipulation, the Court hereby modifies the Order Setting Conditions of Pretrial Release for Natasha Renee Chalk [Dkt. # 12]. Specifically, the Court will replace the limitation set forth in condition 7(l) with the language, "you are limited to one smart phone for personal use, one smartphone for business use, one iPad, and one computer." All other conditions previously imposed remain in full force and effect.

IT IS SO ORDERED.

DATED: 6/27/22

Sheila K. Oberto
HON. SHEILA K. OBERTO
United States Magistrate Court Judge